

March 3, 2011

Charles R. Trimble  
Chairman, U.S. GPS Industry Council  
c/o David Keir (counsel for U.S. GPS Industry Council)  
Lerman Senter PLLC  
2000 K Street, NW – Suite 600  
Washington, DC 20006

Jeffrey J. Carlisle  
Executive Vice President, Regulatory Affairs & Public Policy  
LightSquared  
10802 Parkridge Boulevard  
Reston, VA 20191

**Re: LightSquared Subsidiary LLC,  
File No. SAT-MOD-20101118-00239**

Dear Mr. Carlisle and Mr. Trimble:

On Friday, February 25, 2011, the Chiefs of the International Bureau and the Office of Engineering and Technology issued a letter setting forth their expectations for LightSquared Subsidiary LLC's ("LightSquared") implementation of the GPS interference working group required as a condition to the ATC waiver granted to LightSquared on January 26, 2011.<sup>1</sup> LightSquared submitted an initial report on the working group, prepared jointly with the U.S. GPS Industry Council, on February 25, 2011.<sup>2</sup> CTIA - The Wireless Association® ("CTIA") takes note here that individual wireless service providers have identified initial interference concerns consistent with the Commission's views. By this letter, CTIA asks that all interested mobile service providers and manufacturers be given the opportunity to participate in the working group efforts.

CTIA agrees with the Commission that potential interference to GPS is a "significant concern."<sup>3</sup> Wireless service providers have already begun to examine levels of interference to their networks, services, and device offerings that rely on GPS and these interference issues will be carrier-specific. The Commission observed

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<sup>1</sup> See Letter from Mindel De La Torre, Chief, International Bureau, and Julius P. Knapp, Chief, Office of Engineering and Technology, to Jeffrey J. Carlisle, Executive Vice President, Regulatory Affairs & Public Policy, LightSquared, DA 11-367, at 1 (Feb. 25, 2011) ("IB/OET Letter"); *LightSquared Subsidiary LLC, Request for Modification of its Authority for an Ancillary Terrestrial Component, Order and Authorization*, DA 11-133 (IB rel. Jan. 26, 2011) ("LightSquared ATC Waiver").

<sup>2</sup> See LightSquared February 25, 2011 Report to the FCC, *appended to* Letter from Henry Goldberg, Goldberg, Godles, Wiener & Wright, Counsel for LightSquared Subsidiary LLC, to Marlene H. Dortch, Secretary, FCC, re: STA-MOD-20101118-00239 (Feb. 25, 2011).

<sup>3</sup> *LightSquared ATC Waiver* at ¶ 39.

that it would not select members of the working group but that participation by a “broad cross-section of technical experts is desirable.”<sup>4</sup> To that end, wireless service providers who seek to serve on the working group should have a meaningful opportunity to participate to the fullest extent they wish to do so.

Sincerely,

/s/ *Christopher Guttman-McCabe*

Christopher Guttman-McCabe  
Vice President, Regulatory Affairs

cc: Mindel De La Torre (via email)  
Julius P. Knapp (via email)

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<sup>4</sup> IB/OET Letter at 1.